

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

TYLER R. GOEHRING,

Defendant.

FILED
U.S. DISTRICT COURT
DISTRICT OF NEBRASKA

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OFFICE OF THE CLERK

INDICTMENT
18 USC § 1343

The Grand Jury charges that

COUNTS I-VII

1. Between on or about March 28, 2017, and June 2, 2017 in the District of Nebraska, and elsewhere, TYLER R. GOEHRING, defendant herein, devised and intended to devise a scheme to defraud American Airlines, and to obtain property and money by means of materially false and fraudulent pretenses, representations and promises.

2. Between November 4, 2016 and through June 5, 2017, TYLER GOEHRING served as a "cross utilized agent" for Trego-Dugan Aviation. Trego-Dugan Aviation provides ground handling services for American Airlines and Allegiant Airlines at the Central Nebraska Regional Airport in Grand Island (GRI). In his capacity as a cross utilized agent, TYLER R. GOEHRING had access to terminal operations including ticket sales and bookings. TYLER R. GOEHRING was authorized to sell tickets and make changes to travel itineraries for customers. TYLER R. GOEHRING did not have authority to purchase or change tickets for himself, his family or his acquaintances without remuneration. TYLER R. GOEHRING did not have authority to sell or make changes to tickets without requesting payment.

3. It was part of the scheme that without the approval or authorization of American Airlines, TYLER R. GOEHRING upgraded tickets for himself, his fiancé, friends and family

members without paying for the costs of the ticket upgrades. All ticket upgrades were made by TYLER R. GOEHRING at a terminal in Grand Island, Nebraska and were processed through electronic and wire communication made through the American Airlines processing center in Oklahoma. These upgrades were for tickets for personal use and not authorized by American Airlines.

4. As a result of the scheme and artifice to defraud alleged herein, American Airlines, based out of Fort Worth, Texas, suffered a loss of approximately \$44,666.71.

5. On or about each of the dates set forth below, in the District of Nebraska, and elsewhere, TYLER R. GOEHRING, defendant herein, for the purpose of executing the scheme described above and attempting to do so, caused to be transmitted by means of wire communications, in interstate commerce, the signals and sounds described below for each count, each transmission constituting a separate count:

| | | |
|-----|----------------|--|
| I | March 29, 2017 | Wire communication from Grand Island, Nebraska, through American Airlines processing center (Sabre) in Tulsa, Oklahoma, upgrading ticket in the name of TYLER R. GOEHRING. <u>Original flight</u> : roundtrip coach ticket MCI-DFW for July 1, 2017 through July 8, 2017. <u>Upgraded flight</u> : roundtrip first class ticket ELP-DFW-MCI for July 1, 2017 through July 8, 2017. Upgrade valued at approximately \$1,751.06. |
| II | March 29, 2017 | Wire communication from Grand Island, Nebraska, through American Airlines processing center (Sabre) in Tulsa, Oklahoma, upgrading ticket in the name of E.Z. <u>Original flight</u> : roundtrip coach ticket MCI-DFW for July 1, 2017 through July 8, 2017. <u>Upgraded flight</u> : roundtrip first class ticket ELP-DFW-MCI for July 1, 2017 through July 8, 2017. Upgrade valued at approximately \$1751.06. |
| III | May 07, 2017 | Wire communication from Grand Island, Nebraska, through American Airlines processing center (Sabre) in Tulsa, Oklahoma, upgrading ticket in the name of C.W. <u>Original flight</u> : one-way coach ticket PHX-DFW-GRI for July 5, 2017. |

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|-----|--------------|--|
| | | <u>Upgraded flight</u> : one-way first class ticket PHX-DFW-GRI for July 5, 2017. Upgrade valued at approximately \$859.00. |
| IV | May 07, 2017 | Wire communication from Grand Island, Nebraska, through American Airlines processing center (Sabre) in Tulsa, Oklahoma, upgrading ticket in the name of J.R. <u>Original flight</u> : one-way coach ticket PHX-DFW-GRI for July 5, 2017. <u>Upgraded flight</u> : one-way first class ticket PHX-DFW-GRI for July 5, 2017. Upgrade valued at approximately \$859.00. |
| V | June 2, 2017 | Wire communication from Grand Island, Nebraska, through American Airlines processing center (Sabre) in Tulsa, Oklahoma, upgrading ticket in the name of R.W. <u>Original flight</u> : roundtrip coach ticket MSP-ORD for July 2, 2017 through July 7, 2017. <u>Upgraded flight</u> : roundtrip first class ticket MSP-ORD-CUN for July 2, 2017 through July 7, 2017. Upgrade valued at approximately \$3,232.20. |
| VI | June 2, 2017 | Wire communication from Grand Island, Nebraska, through American Airlines processing center (Sabre) in Tulsa, Oklahoma, upgrading ticket in the name of P.G. <u>Original flight</u> : roundtrip coach ticket MSP-ORD for July 2, 2017 through July 7, 2017. <u>Upgraded flight</u> : roundtrip first class ticket MSP-ORD-CUN for July 2, 2017 through July 7, 2017. Upgrade valued at approximately \$3,232.20. |
| VII | June 2, 2017 | Wire communication from Grand Island, Nebraska, through American Airlines processing center (Sabre) in Tulsa, Oklahoma, upgrading ticket in the name of A.G. <u>Original flight</u> : roundtrip coach ticket MSP-ORD for July 2, 2017 through July 7, 2017. <u>Upgraded flight</u> : roundtrip first class ticket MSP-ORD-CUN for July 2, 2017 through July 7, 2017. Upgrade valued at approximately \$3,232.20. |

All in violation of Title 18, United States Code, Section 1343.

A TRUE BILL.

FOREPERSON /

The United States of America requests that trial of this case be held in Lincoln, Nebraska, pursuant to the rules of this Court.

A handwritten signature in blue ink, appearing to read "SA Russell", is positioned above a horizontal line.

STEVEN A. RUSSELL #16925
Assistant U.S. Attorney